

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA
as representative of	: Title III
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	: Case No. 17-BK-3283 (LTS)
Debtors. <sup>1</sup>	: (Jointly Administered)
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THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE COMMONWEALTH OF PUERTO RICO,	:
as agent of	:
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO	:
as representative of	: Adv. Proc. No. 17-00257-LTS
THE COMMONWEALTH OF PUERTO RICO,	:
Plaintiff,	:
v.	:
BETTINA WHYTE,	:
as agent of	:

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

THE FINANCIAL OVERSIGHT AND :  
MANAGEMENT BOARD FOR PUERTO RICO :  
: as representative of :  
: THE PUERTO RICO SALES TAX FINANCING :  
CORPORATION, :  
: Defendant. :  
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**STATEMENT OF OFFICIAL UNSECURED CREDITORS COMMITTEE IN ITS  
STATUTORY CAPACITY AND AS COMMONWEALTH AGENT IN RESPECT OF  
MOTION OF OFFICIAL COMMITTEE OF RETIRED EMPLOYEES OF  
THE COMMONWEALTH OF PUERTO RICO TO CHANGE OBJECTION  
DEADLINE FOR COFINA SETTLEMENT MOTION**

To the Honorable United States District Court Judge Laura Taylor Swain and the Honorable United States Magistrate Judge Judith Gail Dein:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”), in its statutory capacity and as the Commonwealth Agent (together with the Committee, the “Commonwealth Agent”) with respect to the “Commonwealth-COFINA Dispute,” as defined in the *Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute* [Docket No. 996 in Case No. 17-3283 (LTS)] (the “Stipulation”)<sup>2</sup> hereby files this statement (the “Statement”) in respect of the Motion of the *Official Committee of Retired Employees of the Commonwealth of Puerto Rico to Change the Objection Deadline for COFINA Settlement Motion* [Docket No. 4100 in Case No. 17-3283] (the “Settlement Objection Deadline Motion”) filed by the Retiree Committee (as defined in the Motion). In support of this Statement, the Commonwealth Agent respectfully states as follows:

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

## **STATEMENT**

1. The Commonwealth Agent has not yet determined whether it will file an objection to the merits<sup>3</sup> of the Oversight Board's motion (the “Rule 9019 Motion”) seeking approval of a settlement of the Commonwealth-COFINA Dispute (the “Oversight Board Settlement”). However, the Commonwealth Agent believes that the objection deadline should be much later than requested by the Oversight Board, given that the hearing on the Rule 9019 Motion will not be until January 16, 2018. Therefore, the Commonwealth Agent supports the Retiree Committee’s request for additional time.

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<sup>3</sup> An objection to the merits of the Rule 9019 Motion is to be contrasted with an eventual motion of the Commonwealth Agent to enforce the Stipulation with respect to the 9019 Motion and the Oversight Board Settlement. See Docket No. 4060 in Case No. 17-3283 (LTS).

WHEREFORE, the Commonwealth Agent respectfully requests that (i) the Court extend the deadline to object to the merits of the Rule 9019 Motion and (ii) the Court grant such other and further relief as the Court deems just and proper.

Dated: October 30, 2018

/s/ Luc A. Despins

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the Official Committee of Unsecured Creditors*

- and -

/s/ Juan J. Casillas Ayala

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